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13                           **UNITED STATES DISTRICT COURT**

14                           **DISTRICT OF ARIZONA**

15                           Peter Strojnik, (Sr.),  
 16                           Plaintiff,

17                           vs.

18                           State Bar of Arizona, an Arizona nonprofit  
 19                           corporation; Shauna Miller and John Doe  
 20                           Miller, husband and wife; Maret Vessella  
 21                           and John Doe Vessella, husband and wife;  
 22                           yet unknown Entities and Persons who  
 23                           participated in the conspiracy alleged  
 24                           below,

25                           Defendants.

26                           Case No. CV-19-02704-PHX-DJH

27                           **REPLY IN SUPPORT OF REQUEST**  
 28                           **FOR JUDICIAL NOTICE**

29                           Defendants State Bar of Arizona (“SBA”), Shauna Miller and John Doe Miller  
 30                           (“Miller”), and Maret Vessella and John Doe Vessella (“Vessella”) (collectively, “State Bar  
 31                           Defendants” or “SBA Defendants”) reply in support of their request for judicial notice [Doc.  
 32                           42].

33                           Plaintiff’s singular objection to the SBA Defendants’ request for judicial notice is to  
 34                           “the Court taking judicial notice of the truth of any statements made in items 2 (Complaint  
 35                           against Peter Strojnik in PDJ 2018-9105) and 4 (The State Bar of Arizona’s Motion to Strike  
 36                           in PDJ 2018-9105).” [Doc. 46 at 2]. But Defendants’ request asked only that the listed

1 disciplinary records be judicially noticed for their existence and their reporting of the  
2 circumstances and grounds for discipline and *not* for the truth of the underlying facts. [Doc.  
3 42 at 2].

4 Accordingly, this Court should grant the SBA Defendants' request for judicial notice  
5 for the limited purpose stated in that request.

6 DATED this 26<sup>th</sup> day of August, 2019.

7  
8 **BONNETT, FAIRBOURN, FRIEDMAN &**  
**BALINT, P.C.**

9 By /s/ Lisa T. Hauser  
10

11 Lisa T. Hauser

12 Carrie A. Laliberte

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15 *Attorneys for Defendant State Bar of Arizona*

16  
17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on this 26<sup>th</sup> day of August, 2019, I electronically transmitted the  
19 attached document to the Clerk's Office using the CM/ECF System for filing and transmittal  
20 of a Notice of Electronic Filing to all parties.  
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22  
23 /s/ Carolyn Alter

24 Legal Assistant to Lisa T. Hauser  
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